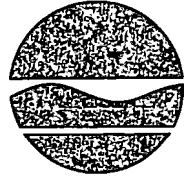


Rachel

New York State Department of Environmental Conservation
Division of Solid & Hazardous Materials
Bureau of Radiation & Hazardous Site Management, 8th Floor
625 Broadway, Albany, NY 12233-7252
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Erin M. Crotty
Commissioner

December 13, 2001

Mr. Larry L. Leskovjan
Manager
Environmental Technology & Compliance
M/S D08-001
Northrop Grumman Corporation
South Oyster Bay Road
Bethpage, New York 11714-3583

Re: Northrop Grumman Corporation
Bethpage Facility, New York
EPA I.D. No. NYD002047967
Plant 24 Access Road Site
PCB Investigation/Delineation Program

The New York State Department of Environmental Conservation and Department of Health have reviewed the above referenced document received on July 26, 2001. We found the report acceptable. Enclosed are specific comments about the Plant 24 Access Road Site report of findings.

Based on this review, We understand that Northrop Grumman will propose a remedial work plan for the Plant 24 Access Road Site. The proposed plan should be protective of public health. Due to its proximity to a park and a residential community, we recommend delineation for those areas where PCB concentrations were found to be greater than 1 ppm but less than 10. ppm

Should you have any questions regarding the content of this letter, please do not hesitate to contact me at (518) 402-8594 or Mr. William Gilday at (518) 402-7880.

Sincerely

Henry Wilkie
Project Engineer
Eastern Engineering Section

Enclosures

275040



cc:

J. Reidy, USEPA Region II

R. Fedigan/ W. Gilday, NYSDOH

A. Cava, Region I

S. Farkas, Region I

S. Kaminski

S. Scharf, DER

Specific Comments on Plant 24 Access Road Site PCB Investigation/Delineation Program

1. Northrop Grumman Corporation (NGC) is to be commended for implementing such an intensive PCB delineation program for soil on the plant 24 Access Road Property.
2. NGC is to be commend for fencing the area where PCB concentrations in surface soil surface NYSDEC TAGM 4046, thereby minimizing the potential for exposure to individuals accessing the property from the adjacent Town Park.
3. Delineation to 10 parts per million (ppm) in deeper soil is appropriate. However, near-surface contamination should be delineated to one ppm. This is necessary to determine the need for the testing in areas of potential exposure, particularly adjacent off-site properties. For this reason:
 - a. Additional surface soil samples should be collected in the narrow grassy strip immediately south of the roadway and adjacent to residential properties. This testing should include 0-2" samples and 0-2 foot samples. This spacing should be such that at least one sample is collected adjacent to each residential property.
 - b. Additional surface soil samples should collected from the grassy area between the eastern fence line and Stewart Avenue.
4. The result of the subject investigation are generally consistent, with respect to location and magnitude of the PCB contamination, with the 1997 Eder Associates investigation. The result for Eder's S-5/S-6 location, however, indicated considerably higher PCB levels than in the nearest NGC sampling points. Samples should collected from the vicinity of the S-5/S_6 location to determine if another localized "hot spot" exists. This location appears to be somewhere between NGC locations B-8 and B-10.
5. During a March 1999 site visit, NYS DOH noticed pieces of what appeared to be slag-like material on the subject property. To better characterize the site and the nature/impacts of this material, the means of the contamination, and the time period contamination.
6. NGC should provide an explanation of the possible source of the PCB contamination, the means of the contamination, and the time period of the contamination.